

Stakeholder report

on external input provided by stakeholders
for assessment of the

certification scheme FSC
International

(request for advice from December 2017)

against the legal Dutch sustainability criteria
for solid biomass for energy applications

by the

Advisory Commission on Sustainability
of Biomass for Energy Applications

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1 Scope of this report

1.1 Introduction

This stakeholder report focusses on the external input as provided by stakeholders and on the ADBE's response to that input. This report is part of the advice of the advisory commission sustainability biomass for energy purposes (ADBE) on the application for approval by certification scheme "Forest Stewardship Council International" (FSC International). Another part of the advice is the public report on the assessment of FSC International. In that public report a general introduction is given, as well as a description of the commission's assessment procedure.

1.2 External input for the certification scheme FSC International

On December 18, 2017 the advisory commission received a request for advice on FSC International from the Dutch Ministry of Economic Affairs and Climate Policy. Via its website and via a news message distributed by email the ADBE announced that external input could be submitted within four weeks. After a request by a stakeholder, the commission decided to prolong this period with one week (from 4 weeks to 5 weeks) as the period included Christmas and New Year. As a result, external input could be submitted from December 18, 2017 to January 22, 2018.

External input was received from the following stakeholders:

1. The US National Wildlife Federation (NWF); and
2. Jointly from Natural Resources Defense Council (NRDC) and Dogwood Alliance.

Their input was largely the same: the input by NWF was also included in the input by NRDC plus Dogwood Alliance. In addition, NRDC plus Dogwood Alliance repeated part of their input under separate sustainability criteria.

In the tables of this report, their input will be marked with colours against a light yellow background:

- | |
|---|
| 1. Input by both NWF and NRDC plus Dogwood Alliance |
| 2. Input (under separate criteria) by NRDC and Dogwood Alliance |

The tables in this report include also the response of the ADBE to the external input. This will be marked red against a light-blue background:

Reaction by the advisory commission is marked by red-coloured text
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In the following chapters only those sustainability criteria and management criteria are listed for which external stakeholders have provided external input. The "toetsingsprotocol" (assessment protocol; available on the ADBE webpage "[Toetsingsprocedure](#)", in Dutch) as well as chapter 4 of the public assessment report give the full list of sustainability and management criteria.

1.3 Readers guide

The next four chapters in this report give the external input provided by NWF and by NRDC plus Dogwood Alliance. External input towards the sustainability criteria is given in chapter 2 and chapter 3, on general and more detailed external input, respectively. External input towards the management criteria is given in chapter 4 and chapter 5, on general and more detailed external input, respectively. Chapter 6 gives the references as provided by the stakeholders. An annex lists the abbreviations that are used throughout this report.

2 General input towards sustainability criteria

The ADBE's form for submitting external input gives in section B the possibility to make more general comments on sustainability criteria. Such general comments provided by the stakeholders are listed in the table below. Please note that this input can only be considered by the commission as part of the assessment if it applies to one or a number of individual sustainability criteria.

<u>Overarching subject (sustainability criteria)</u>	<u>External input</u>	<u>Commission's reaction to the external input</u>
GHG emissions, carbon sinks, carbon debt and land use change (sustainability criteria 1.1 and 3.1 - 5.1)	<p>Carbon accounting is the main shortcoming of the Forest Stewardship Council. FSC is designed to maintain forest "biodiversity, productivity, and ecological processes". Thus, FSC does not account for atmospheric carbon, carbon stocks, or climate change mitigation.</p> <p>Source 1</p>	<p>As this input was repeated under criterion 4.1, a reaction is given in chapter 3 under criterion 4.1</p>
Soil quality and sustainable forest management (sustainability criteria 2.1 and 6.1 - 10.5)	<p>In a study comparing FSC to Sustainable Forestry Initiative (SFI), FSC was found to be a "higher performer for ecological health and social sustainable forestmanagement criteria".</p> <p>Specific provisions in FSC principles and criteria:</p> <ul style="list-style-type: none"> - Requires that indigenous peoples' rights are recognized and upheld. (3.1) - Outlines protections for "rare species, and threatened species and their habitats" (6.5) - Calls for identification and protection of native ecosystems and restoration to natural conditions (6.6) - Maintains existence of "naturally occurring native species and genotypes" - Protects and restores "natural water courses" and provides for mitigation for negative impacts on water quality. (6.7) - Maintains landscape level heterogeneity of characteristics (i.e. species, tree sizes, ages, spatial scales, and regeneration cycles) to enhance resilience. (6.8) - Prevents conversion of natural forest to plantations (6.9) - Requires a management plan that is publicly available and engages affected stakeholders in planning and monitoring processes. (7.1, 7.5, 7.6) - Requires identifying high conservation value speices, ecosystems, habitats, ecosystem services, and community needs. Must maintain or enhance the categories of high conservation. (9.1, 9.2) - Requires post-harvest regeneration to natural or pre-harvest conditions with native species and not GMOs. (10.1, 10.2, 10.4) - Minimizes use of fertilizers, chemical pesticides, and biological control agents. (10.6, 10.7, 10.8) <p>Sources 1 and 3</p>	<p>As this input was repeated under several criteria (7.1, 7.2, 7.3, 7.4, 8.2, 8.3, 8.7, 10.2), a reaction is given in chapter 3 under these criteria.</p>

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<p>Management by a group or regional association (sustainability criteria 11.1 and 11.2)</p>	<p>Requires an "independent legal entity or an individual acting as a legal entity" (1.1) Source 2</p>	<p>As this input was repeated under criterion 11.1, a reaction is given in chapter 3 under criterion 11.1</p>
<p>Chain-of-Custody (sustainability criteria 12.1 - 13.3)</p>	<p>Group certificate has specific provisions for chain of custody, including tracking and tracing products produced by the group. (9.1) Source 2</p>	<p>As this input was repeated under criterion 12.1, a reaction is given in chapter 3 under criterion 12.1</p>

3 External input towards sustainability criteria

The tables below list the external input on individual sustainability criteria and include the reaction of the ADBE to that external input.

Principle 4: The use of biomass does not result in a long-term carbon debt

<u>Sustainability criterion from Dutch legislation</u>		<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
4.1	The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term.	Carbon accounting is the main shortcoming of the Forest Stewardship Council. FSC is designed to maintain forest "biodiversity, productivity, and ecological processes". Thus, FSC does not account for atmospheric carbon, carbon stocks, or climate change mitigation. Source 1	The commission does not agree with the stakeholders on this point and concludes that FSC Int. fully addresses Dutch criterion 4.1 based on FSC criteria 5.2 and 6.3, further strengthened by the International Generic Indicators (document FSC-STD-60-004 V1-0 EN) related to FSC principle 5.

Principle 7: Biodiversity is maintained and where possible enhanced

<u>Sustainability criterion from Dutch legislation</u>		<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
7.1	Sites with a high conservation value and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. The sites may contain one or more of the following values: diversity of species, ecosystems and habitats, ecosystem services, ecosystems at landscape level and cultural values.	Requires identifying high conservation value speices, ecosystems, habitats, ecosystem services, and community needs. Must maintain or enhance the categories of high conservation. (9.1, 9.2) Source 1	The judgement of the commission is in line with the stakeholder input: FSC Int. fully addresses Dutch criterion 7.1
7.2	Measures have been taken to protect endangered plant and animal species and, if applicable, to increase the populations and enhance the habitats	- Outlines protections for "rare species, and threatened species and their habitats" (6.5) Source 1.	The judgement of the commission is in line with the stakeholder input: FSC Int. largely addresses Dutch criterion 7.2

	of these species.		
7.3	<p>The conversion of forests within the forest management unit to other forms of land use, including wood plantations, is not permitted unless:</p> <ul style="list-style-type: none"> - the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and - it clearly leads to long-term advantages for nature conservation; and - there is no damage or threat of damage to sites with a high conservation value. 	<p>Prevents conversion of natural forest to plantations (6.9)</p> <p>Source 1</p>	<p>The judgement of the commission is in line with the stakeholder input: FSC Int. largely addresses Dutch criterion 7.3</p>
7.4	<p>In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage.</p>	<ul style="list-style-type: none"> - Maintains existence of "naturally occurring native species and genotypes" - Requires post-harvest regeneration to natural or pre-harvest conditions with native species and not GMOs. (10.1, 10.2, 10.4) <p>Source 1</p>	<p>The judgement of the commission is in line with the stakeholder input: FSC Int. fully addresses Dutch criterion 7.4</p>

Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced

<u>Sustainability criterion from Dutch legislation</u>		<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
8.2	<p>The water balance and quality of both groundwater and surface water in the forest management unit and downstream outside the forest management unit are at least maintained</p>	<ul style="list-style-type: none"> - Protects and restores "natural water courses" and provides for mitigation for negative impacts on water quality. (6.7) <p>Source 1</p>	<p>The judgement of the commission is in line with the stakeholder input: FSC Int. fully addresses Dutch criterion 8.2</p>

	and where necessary improved.		
8.3	Important ecological cycles present in the forest management unit are preserved, including carbon and nutrient cycles.	- Maintains landscape level heterogeneity of characteristics (i.e. species, tree sizes, ages, spatial scales, and regeneration cycles) to enhance resilience. (6.8) Source 1	The judgement of the commission is in line with the stakeholder input: FSC Int. fully addresses Dutch criterion 8.3
8.7	The use of chemicals is only permitted if ecological processes and the optimal deployment of sustainable alternatives prove insufficient. Pesticides classified as Type 1A and 1B by the World Health Organisation and chlorinated hydrocarbons are not permitted	- Minimizes use of fertilizers, chemical pesticides, and biological control agents. (10.6, 10.7, 10.8) Source 1	The judgement of the commission is in line with the stakeholder input: FSC Int. largely addresses Dutch criterion 8.7

Principle 10: Sustainable forest management is achieved through a management system

<u>Sustainability criterion from Dutch legislation</u>	<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
10.2 A forest management plan is drawn up that at least includes: <ul style="list-style-type: none"> - a description of the current condition of the forest management unit; - long term goals for the ecological functions of the forest management unit; - the annual allowable cut per forest type and, if applicable, the annual allowable harvest of non-timber forest products based on reliable and current data; - budget planning for the implementation of the forest management plan. 	Requires a management plan that is publicly available and engages affected stakeholders in planning and monitoring processes. (7.1, 7.5, 7.6) Source 1	The judgement of the commission is in line with the stakeholder input: FSC Int. fully addresses Dutch criterion 10.2

Principle 11: Forest management by a group or regional association offers sufficient safeguards for sustainable forest management

<u>Sustainability criterion from Dutch legislation</u>	<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
11.1 A group or regional association is led and supervised by an independent legal entity.	Requires an "independent legal entity or an individual acting as a legal entity" (1.1) Source 2	The judgement of the commission is in line with the stakeholder input: FSC Int. fully addresses Dutch criterion 11.1

Principle 12: A chain of custody system is in place for the biomass, covering the entire chain from the first actor to the energy producer, that links the source to the material used in the product or product group, and provides greenhouse gas emission data of each individual link.

<u>Sustainability criterion from Dutch legislation</u>	<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
12.1 Each link in the chain of custody bears final responsibility and has a quality management system in place that provides safeguards for compliance with the requirements of the chain of custody system.	Group certificate has specific provisions for chain of custody, including tracking and tracing products produced by the group. (9.1) Source 2	As Dutch criterion 12.1 is on a quality management system and not about group certification, the commission concludes that the stakeholders have put this input under the wrong criterion. This input belongs to (the criteria under) principle 13 on group certification. The commission has concluded that FSC Int. addresses the criteria under principle 13. This conclusion is in line with the stakeholder input.

4 General input towards management criteria

The ADBE’s form for submitting external input gives in section C the possibility to make more general comments on management criteria. Such general comments provided by the stakeholders are listed in the table below. Please note that this input can only be considered by the commission as part of the assessment if it applies to one or a number of individual management criteria.

<u>Overarching subject (management criteria)</u>	<u>External input</u>	<u>Commission’s reaction to the external input</u>
<p>The scheme has been developed in a thorough way (management criteria 1 - 4)</p>	<p>The standard was developed in compliance with:</p> <ul style="list-style-type: none"> - ISEAL Code of Good Practice for Setting Social and Environmental Standards - ISO/IEC Guide 59 Code of Good Practice for Standardization - WTO Agreement on Technical Barriers to Trade (TBT), Annex 3: Code of Good Practice for the Preparation, Adoption and Application of Standards <p>Source 1</p>	<p>Whether or not FSC International was developed in compliance with these three documents is not part of the assessment of the commission. The commission assesses whether the content of the scheme documents results in compliance to the Dutch management criteria 1 - 4. The commission cannot link this specific input to one of the management criteria and hence concludes that this input does not fulfil the requirements for delivering input. As a result, the commission will not further consider this input.</p>

5 External input towards management criteria

No external input was submitted on individual management criteria.

6 Documents used for considering the external input

The following documents have been used when considering the external input. These documents were provided by the stakeholders that provided external input.

1. Forest Stewardship Council. 2015. FSC International Standard - FSC Principles and Criteria for Forest Stewardship (FSC-STD-01-001 V5-2 EN)
2. Forest Stewardship Council. 2015. FSC standard for group entities in forest management groups (FSC-STD-30-005 (V1-0) EN)
3. Clark M.R. and Kozar, J.S. 2011. [Comparing Sustainable Forest Management Certification Standards: A Meta-analysis](#). Ecology and Society.

Annex – Abbreviations

ADBE	Advisory commission on Sustainability of Biomass for Energy applications
FSC	Forest Stewardship Council
GHG	GreenHouse Gas
ISEAL Alliance	International Social and Environmental Accreditation and Labelling Alliance
ISO	International Organization for Standardization
NRDC	Natural Resources Defense Council
NWF	National Wildlife Federation
WTO	World Trade Organization